

MILLERSHAH
ATTORNEYS AT LAW

Telephone: (866) 540-5505
Facsimile: (866) 300-7367
www.millersshah.com

NATALIE FINKELMAN BENNETT†
nfinkelman@millersshah.com

January 9, 2023

Via ECF

The Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the
District of New Jersey
50 Walnut Street, Room 2042
Newark, NJ 07101

Re: *In re Revlimid & Thalomid Purchaser Antitrust Litigation*
Civil Action No: 2:19-cv-07532-ES-MAH
Fraternal Order of Police, Miami Lodge 20, Insurance Trust Fund, et al. v.
Celgene Corporation, et al.
Civil Action No: 2:22-cv-06694-ES-MAH

Dear Judge Hammer:

We represent Plaintiffs Fraternal Order of Police, Miami Lodge 20, Insurance Trust Fund, Jacksonville Police Officers and Fire Fighters Health Insurance Trust, Carpenters and Joiners Welfare Fund Teamsters Local 237 Welfare Fund and Teamsters Local 237 Retirees' Benefit Fund, and Teamsters Western Region & Local 177 Health Care Plan (collectively "Class Plaintiffs") in the captioned matter. Class Plaintiffs respectfully submit this letter to request the Court's permission to file a motion for leave to amend their complaint.

Class Plaintiffs' proposed Second Amended Class Action Complaint would add a plaintiff that is a member of the putative class set forth in the current complaint and that asserts the same right to relief as the other putative class members based on common questions of law and fact. The Second Amended Class Action Complaint would also update a limited number of factual allegations in the current complaint to conform them to facts learned by Class Plaintiffs through discovery conducted in this matter to date. The Second Amended Class Action Complaint would leave unchanged the causes of actions asserted against Defendants in the current complaint.

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Respectfully,

/s/Natalie Finkelman Bennett

Natalie Finkelman Bennett

NFB/sm

Enclosure

cc: **Via CM/ECF**
Counsel of Record

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2024, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Natalie Finkelman Bennett